

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	x	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
Debtors.	:	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	x	
Plaintiff,	:	
-against-	:	Adversary Proceeding
BANK OF AMERICA NATIONAL ASSOCIATION, <i>et al.</i> ,	:	No. 10-03547 (SCC)
Defendants.	:	
SHIELD SECURITIES LIMITED,	x	
Appellant,	:	15-cv-08052 (ALC)
-against-	:	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	On Appeal from the United
Appellee.	:	States Bankruptcy Court
	x	for the Southern District of
		New York, Honorable
		Shelley C. Chapman,
		Adv. Pro. No. 10-03547

STIPULATION

WHEREAS, the Bankruptcy Court entered the Order Concerning Shield Securities Limited (“Shield”)'s Motion to Dismiss for Lack of Personal Jurisdiction (the “Order”) (ECF No. 1148) on September 28, 2015;

WHEREAS, on October 5, 2015 Shield filed a Notice of Appeal (ECF No. 1);

WHEREAS, accompanying the Notice of Appeal, Shield moved for leave to appeal the Order (the “Motion”) (ECF No. 4), accompanied by the Memorandum of Law in Support of

Shield's Motion (ECF No. 6) and the Declaration of Shannon M. Leitner (ECF No. 5);

WHEREAS, on October 15, 2015, Lehman Brothers Special Financing Inc. ("LBSF") filed an unopposed letter motion extending the time for LBSF to file its Opposition to October 26, 2015 and Shield's time to file its Reply to November 5, 2015, which the Court so ordered on October 16, 2015 (ECF No. 8);

WHEREAS, on October 26, 2015, LBSF filed its Opposition to Shield's Motion for Leave to Appeal (ECF No. 10), along with the Declaration of William F. Dahill (ECF No. 11);

WHEREAS, on November 9, 2015, the parties reached a settlement in principle;

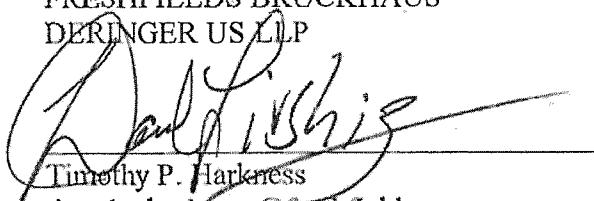
IT IS HEREBY STIPULATED AND AGREED, by and between LBSF and Shield, by their respective undersigned counsel, as follows:

1. The deadline for Shield to file its Reply to LBSF's Opposition is hereby extended to November 24, 2015.

2. Shield reserves all rights and defenses it may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction (including, for the avoidance of doubt, objections to the exercise of in personam jurisdiction over Shield and the exercise of in rem jurisdiction over the subject matter of this dispute).

Dated: November 9, 2015
New York, New York

FRESHFIELDS BRUCKHAUS
DERINGER US LLP



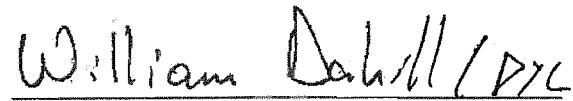
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IT IS SO-ORDERED:

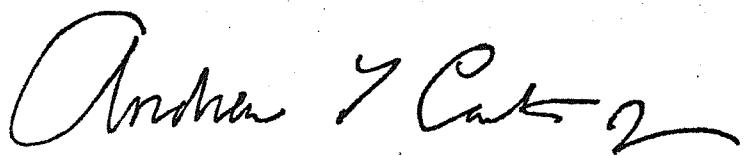
November 10, 2015
New York, New York

WOLLMUTH MAHER & DEUTSCH LLP



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*Attorneys for Appellee Lehman Brothers
Special Financing Inc.*



HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE